

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION

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Washington, D.C. 20554

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In The Matter of)

Amendment of Section 73.202(b),)

Table of Allotments,)

FM Broadcast Stations)

(Anniston & Ashland, Alabama,)

Covington & Milledgeville, Georgia))

MM Docket 98-11

RM 9027

RM 9268

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To:

Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

REPLY COMMENTS

Brantley Broadcast Associates ("BBA") permittee of WAUL(AM) and assignee of WYNI(FM) made supporting comments in the instant proceeding during the initial comment period. BBA strongly supported the downgrade of WHMA(FM) and its subsequent reassignment from Anniston, Alabama, to College Park, Georgia. BBA had engineering counsel which determined a minimum of five changes in Alabama and Georgia which would either create new services or upgrade existing services. Many of these changes would in turn create new opportunities for upgraded or new services reaching into Mississippi.

BBA is aware of opposition to the proposed WHMA change by two Atlanta area licensees. The petitioners which filed objections did not propose a more efficient allotment of the spectrum, they only objected to the intrusion of an

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additional FM signal into the Atlanta area. They did not consider that College Park is a community in need of its own aural service.

BBA has not filed a complete demonstration of the spectrum changes created by the WHMA downgrade, but in the effort to eliminate new competition, the objecting petitioners totally omitted the proposed allotment of channel 261C3 at Anniston and other subsequent substitutions, upgrades and new services.

A basic question the Commission must answer in the instant NPRM is at what point does it become blatantly obvious that objecting petitioners are more concerned in protecting their own "turf" than they are about the efficient distribution of the spectrum? If the objecting petitioners were proposing a more equitable allotment scenario, or desiring to upgrade their own facilities, the objections could be understood. However, in total disregard of the more rural areas of Alabama and Georgia which could receive additional service after the implementation of the WHMA proposal, the objecting petitioners are placing the self-interest of their advertising revenue source ahead of the maximum utilization of the spectrum.

Respectfully Submitted,
BRANTLEY BROADCAST ASSOCIATES


Joan Reynolds,
Proprietor

CERTIFICATE OF SERVICE

I, Joan Reynolds, Sole Proprietor of Brantley Broadcast Associates, do hereby certify that a copy of these Reply Comments was mailed to the Petitioners below by first class postage, US Post Office on the date shown below.

Timothy E. Welch, Esq.
Hill & Welch
1330 New Hampshire Avenue, NW
Suite 113
Washington, D.C. 20036
(Counsel to Preston W. Small)

Mark Lipp, Esq.
Shook, Hardy & Bacon
801 Pennsylvania Ave., N.W.
Suite 600
Washington, D.C. 20004

Werner K. Hartenberger, Esq.
Kevin F. Reed, Esq.
Kevin P. Latek, Esq.
Dow Lohnes & Albertson, P.L.L.C.
21220 New Hampshire Avenue, NW
Suite 800
Washington, DC 20036
(Counsel to Cox Radio, Inc.)

James R. Bayes, Esq.
Rosemary C. Harold, Esq.
Wiley, Rein & Fielding
1776 K Street, NW
Washington, DC 20006
(Counsel to Jefferson-Pilot
Communications Company)

Kathy Archer
Vice President
Southern Star Communications, Inc.
600 Congress Avenue
Suite 1400
Austin, TX 78701

Submitted by;
BRANTLEY BROADCAST ASSOCIATES


Joan Reynolds

September 15, 1998

Brantley Broadcast Associates
415 North College Street
Greenville, AL 36037